

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In Re: ) Chapter 11  
 ) Case No. 12-51502-659  
PATRIOT COAL CORPORATION, ) Jointly Administered  
*et al.*, ) Honorable Kathy Surratt-States  
Debtors. )  
 )

**VERIFIED MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to L.B.R. 2090-1 B.1 of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(E) of the local rules of the United States District Court for the Eastern District of Missouri, David A. Sosne and the firm of Summers Compton Wells PC hereby move that James L. Bromley be admitted pro hac vice to the bar of this Court for the purpose of representing Alpha Natural Resources, Inc., Boone East Development Co., Performance Coal, Co., and New River Energy Corp. and other related affiliates in this case and any pending or subsequently filed adversary proceeding, including, without limitation, the pending adversary styled Eastern Royalty LLC F/K/A Eastern Royalty Corp. v. Boone East Development Co., Performance Coal Co. and New River Energy Corp., Adv. Proc. No. 12-04353. In support of this Motion, the following information as required by Rule 12.01(E) is submitted:

1. James L. Bromley is a partner in the law firm of Cleary Gottlieb Steen & Hamilton LLP located at One Liberty Plaza, New York, NY 10006, as well as other locations, with a telephone number of (212) 225-2000. His e-mail address is [jbromley@cgsh.com](mailto:jbromley@cgsh.com).

2. Mr. Bromley is a 1989 graduate of Columbia Law School.

3. Mr. Bromley was admitted to the Bar of the State of New York in 1990 (Bar No. 2333912) and to the Bar of the State of New Jersey in 1996 (Bar No. 001551996). In addition, Mr. Bromley has been admitted to practice before various federal courts, including:

- a. United States District Court for the Southern District of New York;
- b. United States District Court of the Eastern District of New York;
- c. United States District Court for the District of New Jersey;
- d. United States Court of Appeals for the Second Circuit;
- e. United States Court of Appeals for the Third Circuit.

4. Mr. Bromley affirms that he is a member in good standing of all of the bars set forth above and is not currently under suspension or disbarment from any bar.

5. Mr. Bromley affirms that he does not reside in the Eastern District of Missouri and is not regularly employed by this District and is not regularly engaged in the practice of law in this District.

Mr. Bromley does hereby attest under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that he be admitted pro hac vice to the bar of this Court and be allowed to appear in the instant matter.

Date: January 21, 2013

/s/ James L. Bromley  
James L. Bromley

Respectfully Submitted,  
SUMMERS COMPTON WELLS PC

Date: January 23, 2013

/s/ David A. Sosne  
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